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**NATIONAL URBAN LEAGUE, INC.**  
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**FAX COVER SHEET**

DATE: May 7, 1996

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**TO:** Lygeia Ricciardi  
FCC  
**Fax number:** 202-418-2807  
**From:** John Cawthorne  
Vice President for Education  
Research Professor

Boston College  
Campion Hall  
Chestnut Hill, MA 02167

Telephone: 617-552-4265

Fax: 617-552-0812

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The National Urban League recommends the Joint Board adopt rules and regulations that ensure that all schools and libraries have access to the broadest range of services at prices that are affordable to all.

Please include this letter in the formal recording of the record.

**For more information contact:**

**John E. Cawthorne  
Vice President for Education  
National Urban League  
617-552-4076**



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CHESTNUT HILL, MASSACHUSETTS 02167

**JOHN E. CAWTHORNE**  
VICE PRESIDENT FOR EDUCATION  
106 CAMPION HALL  
Voice 617/552-4265  
Fax 617/552-8419  
Electronic john.cawthorne@BC.EDU

May 7, 1996

CC Docket Number: 96-45

To Members of the Joint Board  
Federal Communications Commission

On behalf of the National Urban League and its 114 affiliates in 34 states, I am writing to comment on the "Special Services" under 254(c) (3) and (h) and to suggest that the Commission be proactive in characterizing additional "special services" for schools and libraries. I wish to make two points: 1) that the definition of "special services" be broad enough to encompass on going changes in the technology, and 2) that all schools and libraries have access to "state of the art" technology as it evolves.

It is critical that the Commission interpret the "special services" section to include all telecommunications that are currently available to the most advanced schools and libraries. The Urban League, representing clients in some of the most financially strapped cities in the country, wants to emphasize the importance of ensuring that the poorest citizens in those districts always have access to whatever the most technologically advanced schools and libraries possess. Otherwise, poor urban and rural schools and libraries will always lag

behind the more advanced ones, and their children, and the country as a whole, will suffer.

The National Urban League believes that a broad definition of "special services" should be evolutionary rather than static. To rigidly define hardware and broad band external connections in terms of today's technology will not allow poorer school districts to keep pace with their more affluent competitors as the definition of "state of the art" evolves. We, further, believe that the proposal to connect schools externally but not internally unnecessarily limits their capacity to grow. We believe that all schools need the capacity connected internally and to external resources. For these reasons, we believe that "special services" should be emphasize capacity rather than function--that is, the regulations should stress what schools and libraries are able to do rather than how they will use the new technologies.

The National Urban League requests that schools and libraries be charged for such services based either on their ability to pay or other mechanisms that ensure that all "special services" are available to all. Such a "sliding scale" fee structure would ensure that no child and no community would have either an advantage or a disadvantage due to the size of its tax base or the wealth of its citizens.

As the Commission thinks about how to select providers of "special services" it should consider as one criterion the proposed provider's willingness to provide discounted rates (and in some cases "scholarships") for those districts most challenged economically. Such a provision would not only enrich the poor districts but would serve businesses well, since it would open up whole new markets to the private sector.

As a nation, we cannot and we dare not deprive large numbers of our citizens of the emerging technology simply because of where they live. It is in the best spirit of this country, that all schools and libraries have access to "state of the art" technology--that all schools and libraries support common and evolving standards of what every community must have in order to be competitive within this nation and with other nations.

**The National Urban League recommends the Joint Board adopt rules and regulations that ensure that all schools and libraries have access to the broadest range of services at prices that are affordable to all.**

**Please include this letter in the formal recording of the record.**

**For more information contact:  
John E. Cawthorne  
Vice President for Education  
National Urban League  
617-552-4076**

I hereby certify that I have caused to be mailed this 7th day of May, 1996 copies of the foregoing comments of the National Urban League, Inc. by first class mail to the following persons:

The Honorable Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M. Street N.W. Rm. 814  
Washington, D.C. 20554

The Honorable Andrew C. Barrett  
Commissioner  
Federal Communications Comm.  
1919 M. Street N.W. Rm. 826  
Washington, D.C. 20554

The Honorable Reed E. Hundt  
Commissioner  
Federal Communications Commission  
1919 M. Street N.W. Rm. 832  
Washington, D.C. 20554

The Honorable Kenneth McClure  
Vice Chairman  
Federal Communications Comm.  
1919 M. Street N.W. Rm. 530  
Washington, D.C. 20554

The Honorable Laska Schoenfelder  
Chairman  
S. Dak., Public Utilities Comm.  
500 E. Capital Avenue  
Pierre, SD 57501

The Honorable Julia Johnson  
Commissioner  
Fla. Public Service Comm.  
Capital Circle Office Center  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

The Honorable Sharon L. Nelson  
Chairman  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504